

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

Blitman Saratoga LLC,

Case No. 20-23177 (SHL)

Debtor.  
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**DECLARATION IN SUPPORT OF MOTION TO LIMIT NOTICE  
OF HEARING TO CONSIDER DEBTOR'S MOTION FOR AUTHORIZATION TO  
SELL 57 JANE STREET TO THE GUIFFRE FAMILY FOR THE SUM OF \$538,000  
FREE AND CLEAR OF ALL CLAIMS, LIENS AND ADVERSE INTERESTS**

Kevin J. Nash, Esq. declares the following under penalty of perjury pursuant to 11  
U.S.C. §1746:

1. I am a member of the firm of Goldberg Weprin Finkel Goldstein LLP,  
counsel for Blitman Saratoga LLC (the "Debtor"), and as such I am fully familiar with the facts  
and circumstances of this case.

2. I make this Declaration in support of the motion (the "Scheduling Motion")  
for an Order scheduling a hearing on shortened notice pursuant to Bankruptcy Rule 9006(c) to  
consider the Debtor's separate Motion (the "Sale Motion") (ECF #120) authorizing the sale of the  
completed home located at 57 Jane Street, Saratoga Springs, New York (the "Home") to Tom and  
Marlene Guiffre for \$538,000, free and clear of all liens, claims and interests pursuant to 11 U.S.C.  
§§363(b) and (f).

3. The Debtor is seeking a hearing on the Sale Motion at the earliest possible  
date, as the Debtor has exhausted its DIP Loan and the sale provides badly needed liquidity.

4. All of the background facts relating to the transaction are contained in the  
Sale Motion which is incorporated herein by reference.

5. The Debtor proposes to serve to serve notice on (a) the Office of the United States Trustee for the Southern District of New York; (b) counsel for the Creditors' Committee; (c) counsel for the Guiffre Family; (d) the DIP Lender and its counsel; and (e) all other parties who have requested notice in this case by email, and the Debtor does not anticipate receiving any opposition to the Sale Motion.

WHEREFORE, the Debtor respectfully request the entry of an Order consistent with the foregoing and granting such other and further relief as is just and proper.

Dated: New York, NY  
November 1, 2022

/s/Kevin J. Nash, Esq.